

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	BANKRUPTCY CASE NO. 19-10663-TPA
	:	
Jacob Daniel Boston and	:	CHAPTER 13
Nichole Marie Boston,	:	
Debtors,	:	
	:	RELATED TO DOCKET NO.: 40
Jacob Daniel Boston,	:	
Movant,	:	HEARING DATE AND TIME:
	:	
vs.	:	
	:	
NFG #2 Federal Credit Union,	:	
	:	
And	:	
	:	
Ronda J. Winnecour, Esquire,	:	
Chapter 13 Trustee,	:	
Respondents.	:	

**NOTICE OF HEARING WITH RESPONSE DEADLINE ON DEBTORS' MOTION TO AVOID AND CANCEL A  
JUDGMENT LIEN ON REAL ESTATE WHICH IMPAIRS EXEMPTIONS OF THE DEBTORS**

**TO THE RESPONDENTS:**

You are hereby notified that the above Movant seeks an Order affecting your rights or property.

You are further notified to file with the Clerk and serve upon the undersigned attorney for Movant's response to the motion no later than **February 8, 2020**, i.e., seventeen (17) days after the date of service below, in accordance with the Federal Rules of Bankruptcy Procedure, Local Rules and Procedures of this Court, and the procedures of the Presiding Judge as found on the Judge's web page at [www.pawb.uscourts.gov](http://www.pawb.uscourts.gov). If you fail to timely respond, the Motion may be granted by the Court by default without a hearing.

You should take this to your lawyer at once.

A hearing will be held **March 4, 2020 at 10:30 am** before Judge Thomas P. Agresti, in Bankruptcy Courtroom, Unites State Courthouse, 17 South Park Row, Erie, PA 16501. Only a limited time of 10 minutes is being provided on the calendar. No witnesses will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled at a later date by the Court. An order granting the relief sought may be entered and the hearing may not be held if you do not timely file and serve a written response.

Date: January 22, 2020

Respectfully submitted,  
/s/ Daniel P. Foster, Esquire  
Daniel P. Foster  
PA I.D. # 92376  
Foster Law Offices  
PO Box 966  
Meadville, PA 16335  
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Attorney for Debtors

**CERTIFICATE OF SERVICE**

I, the undersigned Paralegal of Foster Law Offices, certify under penalty of perjury that I am more than 18 years of age, and that I served a true and correct copy of the NOTICE OF HEARING ALONG WITH DEBTORS' MOTION TO AVOID AND CANCEL A JUDGMENT LIEN ON REAL ESTATE WHICH IMPAIRS EXEMPTIONS OF THE DEBTORS, by Certified Mail, U.S. Postage Paid on the parties below\*.

Executed on: **January 22, 2020**

By: /s/ Clarissa Bayhurst  
Clarissa Bayhurst, PARALEGAL  
FOSTER LAW OFFICES  
PO Box 966  
Meadville, PA 16335  
Tel 814.724.1165  
Fax 814.724.1158

**MATRIX**

Ronda J. Winnecour, Trustee  
[cmecf@chapter13trusteewdpa.com](mailto:cmecf@chapter13trusteewdpa.com)

Office of the United States Trustee  
[Ustregion03.pi.ecf@usdoj.gov](mailto:Ustregion03.pi.ecf@usdoj.gov)

Jacob & Nichole Boston  
14 Beckett Park  
Warren, PA 16365

NFG #2 Federal Credit Union  
c/o Gerald P Bost, COO  
1303 Pennsylvania Avenue West  
Warren PA 16365